



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

November 17, 2015

CERTIFIED MAIL – 7009 0960 0000 8848 7321
RETURN RECEIPT REQUESTED

Curt Gardner, P.E.
EHS Team Member
BASF Corporation
3150 Highway JJ
Palmyra, MO 63461-2611

RE: Approval of Class 1 Permit Modification with Prior Director's Approval
Incinerator Feed System Changes
BASF Corporation, Hannibal Plant, Palmyra, Missouri
EPA ID No. MOD050226075

Dear Mr. Gardner:

The Missouri Department of Natural Resources (Department) hereby approves BASF Corporation's (BASF) Class 1 Permit Modification request, e-mailed November 3, 2015. The request was to add the flexibility to process additional organic waste streams through the "C" incinerator. The additional waste streams are the Imidazolinone Facility No. 1 Organic Waste; Imidazolinone Facility No. 2 Organic Waste; and Pyrrole Facility Organic Waste.

The organic wastes created by these production processes carry waste numbers already permitted for treatment within incinerator "C," and the Department's Air Pollution Control Program (APCP) has concurred that "C" incinerator is capable of treating these waste streams while operating within all parameters of the Permittee's Notice of Compliance. After reviewing this modification request and the Code of State Regulations 10 CSR 25-7.270(1), which incorporates Code of Federal Regulations 40 CFR 270.42., Appendix I.L.6., the Department has determined that this request does not necessitate the Class 2 Permit Modification required for burning different wastes. Therefore, the Department agrees with BASF that this is a Class 1 Permit Modification requiring prior Director Approval.

We are approving this Class 1 Permit Modification requests with the following condition:

1. Within 60 days of receiving this letter, BASF shall submit an updated feed system flow diagram for each of the four incinerators at the facility to incorporate this



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modification, and the modifications approved in a previous Class 1 Permit Modification letter, dated October 27, 2015.

2. Within 60 days of receiving this letter, BASF shall submit an update to their Part 70 Air Permit renewal application to the APCP to include all of the recently approved re-routing changes.

BASF must send a notice of the modification to everyone on their facility mailing list and the appropriate units of state and local government within 90 calendar days after the date of this letter, according to 10 CSR 25-7.270(1), which incorporates 40 CFR 270.42(a)(1)(ii). BASF must send a copy of the notice to the Department.

If you have questions regarding this letter, please contact Nathan Kraus, P.E., of my staff at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, by telephone at (573) 751-3553 or 1-800-361-4827, or by e-mail at nathan.kraus@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

Richard A. Nussbaum, P.E., R.G.
Chief, Permits Section

RAN:nkm

c: Ken Herstowski, P.E., Project Manager, U.S. EPA Region 7
Steve Sidebottom, E.S., Missouri Department of Natural Resources, Air Pollution
Control Program
Northeast Regional Office, Missouri Department of Natural Resources